

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-268-T

**Application of Zip2Zip Movers, LLC for
Class E (Household Goods) Certificate of
Public Convenience and Necessity for
Operation of Motor Vehicle Carrier**

**MOTION FOR PERMISSION TO
PRESENT SHIPPER WITNESS
TESTIMONY BY DECLARATION**

The Commission’s regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E Mover of Household Goods with Statewide Authority is found in S.C. Code Regs. 103-333. Applicant submits the interests of judicial economy would be served by the Commission allowing it to present the testimony of its “shipper witness” by affidavit subject to the conditions set forth in Application of Midlands Movers, LLC, Order No. 2018-643, Docket No. 2018-268-T, and therefore so moves.

Respectfully submitted,

s/ Charles L.A. Terreni

Date: December 30, 2020

Charles L.A. Terreni
TERRENI LAW FIRM, LLC
1508 Lady Street
Columbia, South Carolina 29201
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SC Bar. No. 15235

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020 - 268-T

**Application of Zip2Zip Movers, LLC for
Class E (Household Goods) Certificate
of Public Convenience and Necessity for
Operation of Motor Vehicle Carrier**

**DECLARATION OF
Mikel-Ann Scott**

Being duly deposed and sworn, Affiant states:

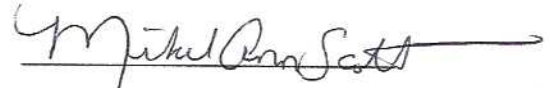
1. My name is Mikel-Ann Scott and my business address is:
100 W. Stone Ave. Greenville, SC, 29609.
2. I am giving this affidavit in support of the application of Zip2Zip Movers, LLC
for a Class E Certificate of Public Convenience and Necessity with statewide authority to
move household goods to points and places throughout the state of South Carolina.
3. I am employed by Marchant Real Estate as a real estate agent. I have worked
as a real estate agent in the Greenville area since 2012.
Marchant Real Estate provides real estate services throughout the State of South
Carolina.
4. I know the public needs qualified movers to transport household goods within South
Carolina because I am often asked to recommend household goods movers by clients or
acquaintances moving from one part of the state to another. There is always a need for
qualified movers due to South Carolina's robust real estate market, especially if the movers
are dependable and experienced. I would like to have another company, such as
Zip2Zip Movers, LLC to recommend to people looking for moving services.
5. Based on my knowledge of the need for household goods movers in South Carolina, I
believe the public interest would be served by granting a Certificate of Public Convenience
and Necessity to Zip2Zip Movers, LLC

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VERIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by contempt.

Date: Nov 19, 2020


Mikel-Ann Scott

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-268-T
CERTIFICATE OF SERVICE

I, **CARL E. BELL**, hereby certify that I have, on this 30th day of December 2020, served the **Motion for Permission to Present Shipper Witness Testimony and Declaration (Testimony) of Mikel-Ann Scott for Zip2Zip Movers, LLC**, upon the parties listed below by electronic mail:

C. Lessie Hammond, Counsel
lhammonds@ors.sc.gov
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

Carri Grube Lybarker, Counsel
SC Department of Consumer Affairs
Post Office Box 5757
Columbia, South Carolina 29250
clybarker@scconsumer.gov

Benjamin Fleming, Co-Owner
info@zip2zipmovers.com
Zip2Zip Movers, LLC
5 Alex Court
Greenville, South Carolina 29609

Roger P. Hall, Asst. Consumer Advocate
SC Department of Consumer Affairs
Post Office Box 5757
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Columbia, South Carolina
December 30, 2020